

DOWNEY BRAND LLP
 JAMIE P. DREHER (Bar No. 209380)
 JOSEPH K. LITTLE (Bar No. 322179)
 Email: jdreher@downeybrand.com
 621 Capitol Mall, 18th Floor
 Sacramento, California 95814
 Telephone: 916.444.1000
 Facsimile: 916.444.2100

Attorneys for Robert Reeve,
 Sonntag-Reeve Eye Center, Inc.,
 and Sonntag-Reeve Medical Corp.

UNITED STATES BANKRUPTCY COURT
 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re
 PG&E Corporation,
 and
 PACIFIC GAS AND ELECTRIC
 COMPANY,
 Debtors.

Case No. 19-30088-DM

Chapter 11
 Lead Case, Jointly Administered

**DECLARATION OF RICHARD
 FRANKEL IN SUPPORT OF MOTION
 PURSUANT TO FED. R. BANKR. PROC.
 7015 AND 7017 TO JOIN REAL PARTIES
 IN INTEREST FOR CLAIM
 PREVIOUSLY FILED, OR IN THE
 ALTERNATIVE, TO ENLARGE TIME
 TO FILE PROOF OF CLAIM PURSUANT
 TO FED. R. BANKR. PROC. 9006(b)(1)**

☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

*All papers shall be filed in the Lead Case,
 No. 19-30088-DM,

Date: August 4, 2020
 Time: 10:00 a.m.
 Crtrm.: Courtroom 17
 450 Golden Gate Avenue
 San Francisco, CA 94102
 Judge: Hon. Dennis Montali

Objection deadline: July 28, 2020
 4:00 p.m. (Pacific Time)

I, Richard Frankel, hereby declare as follows:

1. I am an attorney at law duly licensed to practice before the courts of the State of Texas, and in numerous federal courts. I am a lawyer with Reiner, Slaughter & Frankel, LLP, based in Redding, California.
2. My law firm represents wildfire victims who sustained losses from the Camp Fire

1 in 2018. My firm has timely filed over 800 Proof of Claim forms with Prime Clerk for losses
2 clients have suffered as a result of these fires.

3 3. Robert Reeves filed a claim in this matter for property and business loss on October
4 18, 2019, well before the extended December 31, 2019 Claims Bar Date Deadline had passed. At
5 the time, he had different counsel.

6 4. On or about April 15, 2020, I became informed that, to the extent Robert claimed
7 business losses in his proof of claim, other entities owned by Robert actually suffered some of
8 those losses (in other words, would have been the proper "plaintiffs" or parties-in-interest to
9 assert, for example, certain business damages, which were in fact asserted in the initial proof of
10 claim). Those entities are Sonntag-Reeve Eye Center, Inc. and Sonntag-Reeve Medical Corp. I
11 only became aware of this fact following the receipt of further and additional documentation on
12 the claims from Dr. Reeve and our firm's continuing investigation.

13 5. On April 22, 2020, we filed an amended proof of claim that included Sonntag-
14 Reeve Eye Center, Inc. and Sonntag-Reeve Medical Corp. We later sought the assistance of
15 local counsel to file this Motion.

16 6. I am over eighteen years of age, of sound mind, and fully competent to make this
17 declaration. All statements in this declaration are based on my own personal knowledge and
18 observation and from my review of the court and business records in this case, or upon
19 information and belief as indicated. If called to testify on this matter, I can and would competently
20 testify to the matters set forth in this Declaration.

21 I declare under penalty of perjury pursuant to the laws of the United States of America that
22 the foregoing is true and correct.

23 Executed this the 11th day of July, 2020, in Houston, Texas.

24
25 By: 

26 RICHARD FRANKEL
27
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